

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

MANUEL CHAIREZ,

Plaintiff,

CF JORDAN CONSTRUCTION, LLC,

Defendant.

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Case No. EP-11-CV-141

PLAINTIFF'S RULE 26a DISCLOSURES

Plaintiff MANUEL CHAIREZ ("MR. CHAIREZ"), makes the following disclosures pursuant to Federal Rule of Civil Procedure 26a.

SIGNED this 13 day of May, 2011.

Respectfully submitted,

Chavez Law Firm

2101 Stanton Street

El Paso, Texas 79902

(915) 351-7772

(915) 351-7773 facsimile

By: 

Enrique Chavez, Jr.

State Bar No: 24001873

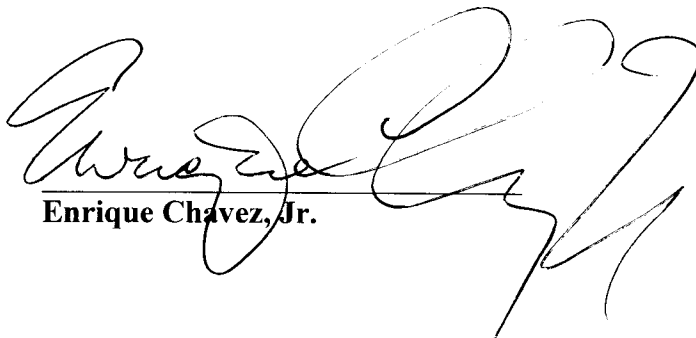
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument was delivered to opposing counsel on May 13, 2011, in the following manner:

Harrel L. Davis, III
Gordon, Davis, Johnson & Shane, P.C.
4695 N. Mesa Street
El Paso, Texas 79912

☐ Via Regular Mail
☐ Via Certified Mail/RRR
☐ Via Facsimile (915) 545-4433
☒ Via Hand Delivery


Enrique Chavez, Jr.

A. The name, and, if known, the address and telephone number of each individual likely to have discoverable information relevant to disputed facts, and the subjects of the information are

Plaintiff expects to present the following witnesses:

Manuel Chairez

2527 Louisiana St.

El Paso, Texas 79930

(915) 564-9117

c/o

Enrique Chavez, Jr.

2101 N. Stanton Street

El Paso, TX 79925

(915) 351-7772

Plaintiff

Bea Sanchez

Gigi Baker

Grace Gandarilla

Sandy Piper

Kevin Piper

c/o

C.F. Jordan Construction, LLC

7700 C.F. Jordan Drive

El Paso, Texas 79912

(915) 877-3333

c/o

Harrel L. Davis, III

Gordon, Davis, Johnson & Shane, P.C.

4695 N. Mesa Street

El Paso, Texas 79912

(915) 545-1133

Defendant's agents

Marcie Downing

Hearing Officer

Texas Workforce Commission

Appeal Tribunal

TWC Building

101 W. 15th St., Rm 678

Austin, Texas 78778

Investigating Agency

UI Support & Customer Service

Texas Workforce Commission

P.O. Box 562

El Paso, Texas 79944-0562
(915) 832-6400
Investigating Agency

Texas Workforce Commission
101 E. 15th St. Rm 354
Austin, Texas 78778-0001
Investigating Agency

Benefit Payment Control
Texas Workforce Commission
101 E. 15th St. Rm 568
Austin, Texas 78778-0001
Investigating Agency

Texas Workforce Commission
Appeal Tribunal
TWC Building
101 W. 15th St., Rm 678
Austin, Texas 78778
Investigating Agency

AON Risk Services Southwest, Inc.
2700 North Haskell Ave., Ste. 800
Dallas, Texas 75204
Investigating Agency

Centro Radiologico, S.A. de C.V.
Av. Lopez Mateos 890 Sur
Col Nogales, Cd. Juarez, Mexico
616-15-05
Rendered medical treatment to Plaintiff

Hospital Juarez
Boulevard Oscar Flores Sanchez #5407
Cd. Juarez, Chih., Mexico
19-93-80
Rendered medical treatment to Plaintiff

Dr. Cesar A. Carrillo Valles
Hospital Medica Sur
Ejercito Nacional 6325 Consultorio 207
Cd. Juarez, Chih. Mexico
623-9706
Rendered medical treatment to Plaintiff

B. The description of documents relevant to disputed facts, include, but are not limited to:

Plaintiff's employee file as well as those of comparators, if any, including evaluations, qualifications, and disciplinary records and Defendant's manuals policies and procedures and net worth information (e.g. Defendant's latest annual report to shareholders).

C. A computation of any category damages claimed by the party, making available for inspection and copying, as under Rule 34, the documents or other evidentiary material, on which such computation is based, including materials bearing on the nature and extent of injuries suffered:

Mr. Chairez made \$15.50 per hour with CF Jordan (\$620.00 weekly). Mr. Chairez will lose \$32,240.00 ($\620.00×52 weeks) per year until the age of retirement, at age 67 years.

The informational basis for determining the lost value of Plaintiff's benefits is under Defendant's control. As to mental anguish damages, punitive damages and other non-economic damages, such is properly left to the jury's fair judgment.

D. Identity of Experts – The following persons may be used at trial to present evidence under Federal Rules of Evidence 702, 703, 705:

John A. Wenke, 501 E. California Ave., El Paso, Texas, 79902, (915) 351-8877
Enrique Moreno, 701 Magoffin Avenue; El Paso, Texas 79901, (915) 533-9977
George Andritsos, 1201 N. Mesa Street, Suite H, El Paso, Texas 79902, (915) 577-9994
Francisco Dominguez, 521 Texas Avenue, El Paso, Texas 79901, (915) 533-5544
Enrique Chavez, Jr., 2101 N. Stanton Street, El Paso, Texas 79902, (915) 351-7772

The above-named experts may testify as to their education, experience, and training as attorneys, and may testify as to the reasonableness and necessity of attorney's fees in this case.